

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RM AUCTIONS, INC d/b/a RM
SOTHEBY'S and RM
FINANCIAL SERVICES LLC,

Case No. 2:24-cv-12739

Plaintiffs,

Honorable Nancy G. Edmunds

v.

JEAN GUIKAS and GTC SASU,

Defendants.

PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE

Plaintiffs RM Auctions, Inc. d/b/a RM Sotheby's ("RMS") and RM Financial Services LLC ("RMFS"), by and through its counsel, Dykema Gossett PLLC, hereby responds to this Court's October 18, 2024 Order to Show Cause to establish that the Court has diversity of citizenship subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332. Plaintiffs state as follows:

1. Plaintiffs' Response is filed to allege additional jurisdictional facts regarding the citizenship of RMFS's members pursuant to the Court's Order to Show Cause dated October 18, 2024. (ECF No. 2.)
2. Plaintiff RMFS is a Delaware limited liability company.

3. Plaintiff RMFS's sole member is Plaintiff RM Auctions, Inc., which is a Delaware corporation having its principal place of business at 1711 Thunderbird Street, Troy, Michigan 48084.

4. Plaintiffs incorporate the remainder of their citizenship allegations from their Petition, which, along with RMFS's citizenship, establish that this Court has diversity jurisdiction pursuant to 28 U.S.C. § 1332(a)(2) because the parties are citizens of different States and citizens or subjects of a foreign state. Plaintiffs RMS and RMFS are each citizens of Delaware and Michigan for purposes of diversity jurisdiction, whereas Guikas and GTC are citizens of France.

5. Accordingly, this Court has proper subject matter jurisdiction over this action.

Dated: October 28, 2024

Respectfully submitted,

/s/ Mark J. Magyar

Mark J. Magyar (P75090)

DYKEMA GOSSETT PLLC

201 Townsend Street, Suite 900

Lansing, MI 48933

(616) 776-7523

mmagyar@dykema.com

Ashley R. Fickel

DYKEMA GOSSETT PLLC

333 South Grand Avenue, Suite 2100

(213) 457-1758

afickel@dykema.com